

FMC Allen Park
MID 980568711
5/16/90

FINANCIAL CAPABILITY

Part 7 R299.9701 to R299.9710

Note: Facilities not yet issued an operating license in accordance with Part 5 of these rules shall comply with Financial capability, Part 7, of these rules, by August 14, 1989. Rule 701.(2) Federal and State facilities are exempt from financial capability requirements.

Cost estimate for Closure and Post Closure Care Rule 702(1):

40 CFR 264.142 and 264.144

	Violation			
	<u>Class</u>	<u>Yes</u>	<u>No</u>	<u>N/A</u>
1. Is the written closure cost estimate available and on site? 264.142(d) Note: Indicate the amount:		✓		
	46,726,294 (Au FMC in MI)			
2. Is the written post closure cost estimate available and on site 264.144(d) (Required only for disposal surface impoundment, land treatment, landfill unit or waste pile. Note: Indicate the amount:		✓		
	Allen PK - \$686,001 ⁰⁰			
	\$955,576 ⁰⁰			
3. a) Have any revisions been made to the closure/post closure plan which increase the cost of closure/post closure? 264.142(c) and 264.144(c).	✓	✓		
b) If yes, were the cost estimate(s) revised to reflect this increase within 30 days of approval to modify closure/post closure plan?				

9-28-89

	Violation Class	Yes	No	N/A
4. Have the closure/post closure cost estimates been adjusted for inflation by either recalculating cost estimates or using an inflation factor derived from the most recent implicit price deflation? 264.142(b) and 264.144(b)	_____	<u>✓</u>	_____	_____
a) Have closure/post closure cost estimates been revised within 30 days after firm's fiscal year (for facilities using financial test or corporate guarantee)?	_____	_____	_____	_____
b) For all other financial instruments, have closure/post closure cost estimates been revised within 60 days prior to anniversary date of establishment?	_____	_____	_____	_____
5. Have closure/post closure cost estimates for facilities using financial test or corporate guarantee been revised within 30 days after close of firms fiscal year? 264.142(b) and 264.144(b)	_____	<u>✓</u>	_____	_____
6. For all other financial instruments have closure/post closure cost estimates for facilities been revised within 60 days of their anniversary date of establishment? 264.142(b) and 264.144(b)	_____	<u>✓</u>	_____	_____
7. Have the closure/post closure cost estimates been adjusted by either recalculating cost estimates or using the most recent appropriate inflation factor? 264.142(b) 264.144(b)	_____	<u>✓</u>	_____	_____

Comments: _____

Financial Assurance for Closure/Post Closure Care Rule 703

8. Indicate which of the following financial mechanism(s) are used to establish financial assurance for closure/post closure care Rule 703(1). Also, indicate if its for closure/post closure care Rule 7083 (1).

<input type="checkbox"/>	Trust fund Rule 704
<input type="checkbox"/>	Surety bond guaranteeing performance of closure/post closure care. Rule 705
<input type="checkbox"/>	Letter of Credit, Rule 706.
<input type="checkbox"/>	Certificate of Deposit or Time Deposit account. Rule 707
<input type="checkbox"/>	Closure post/closure insurance Rule 708
<input checked="" type="checkbox"/>	Financial test and corporate guarantee for closure/post closure Rule 709.

	Violation Class	Yes	No	N/A
9. If multiple mechanisms are used are they limited to trusts, surety bonds, letters of credit certificates of deposits and insurance? Rule 703(2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. Are financial assurance mechanisms used for more than one facility? Rule 703(3). If so, indicate their names and ID number.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: _____

FINANCIAL MECHANISMS

11. Trust fund. Rule 704
- A. Is trust agreement on DNR approved form? Rule 704(1)
- ☐ ☐ ☐ ☐

	Violation Class	Yes	No	N/A
B. Is trust funded at 100% closure/post closure cost. Rule 704(2).	_____	_____	_____	_____
If no, indicate amount.	_____			
12. Surety Bond Guarantee. Rule 705				
A. Is bond executed on DNR approved form? Rule 705(1)	_____	_____	_____	_____
12. B. Is sum of bond equal or greater than closure/post closure costs? Rule 705 (4). If no, indicate amount.	_____	_____	_____	_____
13. Letter of Credit Rule 706				
A. Is letter of credit executed on a form approved by Director. Rule 706(1)	_____	_____	_____	_____
B. Is letter of credit accompanied by a letter from owner/operator providing the following: EPA ID number; name and address of facility; amount of funds assured for closure/post closure? Rule 706(3)	_____	_____	_____	_____
C. Is letter of credit equal to or greater than closure/post closure costs? Rule 706(5) If no, indicate amount.	_____	_____	_____	_____
14. Certificate of deposit/time deposit. Rule 707				
A. Is certificate or account in only name of the director? Rule 707(2)	_____	_____	_____	_____

		Violation Class	Yes	No	N/A
B.	Is there an agreement which identifies reasons which director may cash the certificate or account on a DNR approved form? Rule 707(3)	_____	_____	_____	_____
C.	Is certificate for amount equal to closure/post closure cost estimates. Rule 707(4).	_____	_____	_____	_____
	If no, indicate amount.	_____			
15.	Closure/post closure insurance. Rule 708.				
A.	Does certificate use wording approved by director; or	_____	_____	_____	_____
B.	A certified true and complete copy of the policy. Rule 708(1)	_____	_____	_____	_____
C.	Is the closure/post closure insurance policy issued for face amount at least equal to current closure/post closure cost estimate? Rule 708(4).	_____	_____	_____	_____
	If no, indicate amount.	_____			
16.	If using multiple assurance mechanisms, do they equal or exceed closure/post closure cost estimates? Rule 703(2).	_____	_____	_____	_____
	Indicate total.	_____			

Comments: _____

	Violation Class	Yes	No	N/A
17. Financial test and corporate guarantee, Rule 709. For financial test does the owner operator meet A or B? Rule 709(1)				
A. All of the following:				
1. Two of the following three ratios:				
a. Ratio of liabilities to net worth less than 2.	_____	_____	_____	_____
b. A ratio of sum of net income plus depreciation depletion and amortization to total liabilities of more than 0.1.	_____	_____	_____	_____
c. A ratio of current assets to liabilities of more than 1.5. and:	_____	_____	_____	_____
2. Net working capital and tangible net worth each not less than 6 times the sum of closure and post/closure cost estimates.	_____	_____	_____	_____
3. Tangible net worth not less than \$10,000,000 and:	_____	_____	_____	_____
4. Assets in the U.S. not less than 90% of total assets or not less than 6 times the closure/post closure costs and:	_____	_____	_____	_____
5. Total assets in Michigan not less than \$50,000,000 or not less than 6 times sum of approved closure/post closure cost estimates (larger of the two).	_____	_____	_____	_____

Comments: _____

or all of the following:

	Violation Class	Yes	No	N/A
B. 1. An acceptable Standard and Poors or Moody's Rating for the most recent bond issuance.	_____	_____	_____	_____
2. Tangible net worth not less than 6 times the sum of closure/post closure cost estimates.	_____	_____	_____	_____
3. Tangible net worth not less than \$10,000,000	_____	_____	_____	_____
4. Assets in the U.S. not less than 90% of total assets or not less than 6 times closure/post closure costs.	_____	_____	_____	_____
5. Total assets in Michigan at least \$50,000,000 or not less than 6 times sum of approved closure/post closure cost estimates (or larger of the two)	_____	_____	_____	_____

Comments: _____

18. For financial test and corporate
guarantee has the owner operator:
Rule 709(3)

A. Have a letter signed by chief financial officer and worded as specified by director.	_____	_____	_____	_____
B. A copy of independent CPA report examining owner operators financial statement.	_____	_____	_____	_____
C. A copy of special report by independent CPA stating:	_____	_____	_____	_____

	Violation Class	Yes	No	N/A
1. The Independent CPA compared data from chief financial officer which specifies having derived from the independent audit-year-end financial statement; and	_____	<input checked="" type="checkbox"/>	_____	_____
2. No matters came to their attention indicating the information needs adjustments.	_____	<input checked="" type="checkbox"/>	_____	_____
19. Corporate guarantee. Rule 709.10 Does owner meet requirements of 17 and 18 above; and:				
A. Use wording identical to wording provided by Director.	_____	_____	_____	_____
B. Does terms of corporate guarantee include:				
1. Appropriate provisions of owner/operator facts to perform final closure	_____	_____	_____	_____
2. Appropriate cancellation provisions.	_____	_____	_____	_____
3. Alternate financial assurance provisions.	_____	_____	_____	_____

Comments: _____

Liability Requirements Rule 710
 (Note: When reviewing insurance, do not include amount of deductible coverage)

19. Does owner/operator maintain liability coverage for sudden and accidental occurrences not less than \$1,000,000 per occurrence with an annual aggregate not less than \$2,000,000? Rule 710(1)	_____	<input checked="" type="checkbox"/>	_____	_____
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	Violation Class	Yes	No	N/A
20. For surface impoundment landfill or land treatment does owner/operator maintain liability coverage for sudden accidental occurrences not less than \$3,000,000 per occurrence with an annual aggregate of not less than \$6,000,000? Rule 701(2)	_____	_____	_____	_____
21. For the required insurance policy(s) is each policy amended by attachment of an endorsement on a form provided by the Director? and	_____	<input checked="" type="checkbox"/>	_____	_____
22. Is insurer licensed to transact business in Michigan?	_____	_____	_____	_____

Comments: _____



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

MAR 26 1987

REPLY TO THE ATTENTION OF:
SHE-12

U.S. EPA ID #: MID980508711

FORD MOTOR CO ALLEN PARK CLAY MINE
3001 MILLER RD ROOM 2042
DEARBORN MI 48121

Re: RCRA Financial Responsibility

Dear Owner/Operator:

On October 30, 1986, the State of Michigan was granted final authorization by the Administrator of the United States Environmental Protection Agency (U.S. EPA) to administer a hazardous waste program in lieu of the Federal program. As a result of final authorization, Michigan is required to enforce the provisions of the Resource Conservation and Recovery Act (RCRA). One of these provisions (40 CFR Part 265, Subpart H) requires all hazardous waste facilities to demonstrate financial responsibility for liability coverage and closure/post-closure care.

To implement this aspect of authorization, financial documents must be written to satisfy the requirements of the Michigan Administrative Code 1985 AACs, Part 7, which is the Michigan equivalent of 40 CFR Part 265, Subpart H. This letter is to notify you that your financial test should be updated and sent to the Director of the Michigan Department of Natural Resources within 90 days after the close of your fiscal year.

If you have any questions or desire additional information, please contact Ms. Sharon Johnson at (312) 886-4581 or Ronald Brown at (312) 353-7921.

Sincerely yours,

William E. Muno, Chief
RCRA Enforcement Section

cc: John Bohunsky, MDNR

MAY 27 1986

MID 980 568721

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. D.L. Fitzgerald
Corporate Insurance Department
Ford Motor Company
The American Road
P.O. Box 1899
Dearborn, Michigan 48121

Re: Letter of Warning
Ford Motor Company
Financial Assurance

Dear Mr. Fitzgerald:

Ford Motor Company operates a number of hazardous waste treatment, storage or disposal facilities under the Resource Conservation and Recovery Act (RCRA), as amended, which are subject to financial responsibility requirements as provided in 40 CFR 265 Subpart H.

Based upon review of your company's recently submitted financial test, dated March 27, 1986, Ford Motor Company has failed to meet the requirements of 40 CFR 265.143(e).

The chief financial officer letter and the corporate guarantee must be worded identical to the wording specified in 40 CFR 264.151(f) and 264.151(h). Enclosed is a highlighted set of documents indicating the omissions from your submittal. Therefore, please provide U.S. EPA, Region V, with original amended documents.

Failure to provide this information within 30 days upon receipt of this letter may subject the facility to enforcement action. Forward this information to:

Sharon R. Johnson
U.S. EPA - 5HE-12
230 S. Dearborn Street
Chicago, Illinois 60604

If you have any questions or desire additional information, please contact Sharon R. Johnson at (312) 886-4581.

Sincerely,

William E. Muno, Chief
RCRA Enforcement Section

Enclosure

bcc: Ronald Kolzow

WMD:WHER:DES:EPH #1:S. JOHNSON:o.robinson:5/22/86:

INT. DATE	THREAT	ACTION	OTHER STAFF	EXT. DATE	EXT. STAFF	EXT. DATE	EXT. STAFF	WMD
0-2-5-22-86	5-22-86	5-22-86	AL 5-22-86		AP 5-23-86	WEM 5/27/86		



Ford Motor Company

RECEIVED
MAR 2 1985

The American Road
P.O. Box 1899
Dearborn, Michigan 48121
March 29, 1985

WASTE MANAGEMENT
BRANCH

Regional Administrator
U.S. EPA, Region V
230 S. Dearborn St.
Chicago, IL 60604

Dear Sir:

Subject: Hazardous Waste Management Financial Assurance Filings

Enclosed are the documents required for the annual hazardous waste management financial assurance filing, a letter from the Chief Financial Officer, an audited annual report, and a special report from the independent CPA on the financial data in the letter. Copies of Form 10-K filed with the Securities and Exchange Commission are not yet available. I will send the 10-K report to you as soon as possible.

If you have any questions, please call me at (313) 322-9762.

Sincerely,

A. D. Hagerty
Corporate Insurance Department

Enclosures
(23-EN1)

Ford Motor Company
Dearborn, Michigan

We have examined the consolidated financial statements of Ford Motor Company and Consolidated Subsidiaries for the year ended December 31, 1984, and have issued our report thereon dated February 8, 1985. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

Mr. W. M. Caldwell, Ford Motor Company Executive Vice President and Chief Financial Officer, stated in letters dated March 29, 1985 to the Director of the California Department of Health Services Toxic Substances Control Division, the New Jersey Department of Environmental Protection Commissioner, the United States Environmental Protection Agency Regional Administrator (Region V), the Missouri Department of Natural Resources Waste Management Programs, the Technical Secretary of the Indiana Environmental Management Board and the Director of the Ohio Environmental Protection Agency that tangible net worth and total assets in the United States at December 31, 1984 aggregated \$9,501 million and \$17,648 million, respectively, and that such assets in the United States were less than 90 percent of total assets. We have compared this data with corresponding data which we have derived from the financial statements referred to above.

In connection with the aforementioned procedure, no matters came to our attention which caused us to believe that the data specified above should be adjusted.

Coopers & Lybrand

Coopers & Lybrand
400 Renaissance Center
Detroit, Michigan 48243
March 29, 1985



Ford Motor Company

The American Road
P.O. Box 1899
Dearborn, Michigan 48121

March 29, 1985

Regional Administrator
U.S. EPA, Region V
230 South Dearborn Street
Chicago, IL 60604

Subject: Hazardous Waste Management Financial Requirements

I am the chief financial officer of

Ford Motor Company
The American Road
Dearborn, Michigan 48121

This letter is in support of the use of the financial test to demonstrate financial assurance for liability coverage and closure and/or post-closure care, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

See Attachment 1

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

See Attachment 2

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

See Attachment 3

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

None

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1984.

Part B: Closure or Post-Closure Care and Liability Coverage

(Alternative II)

- | | |
|---|---|
| 1. Sum of current closure and post-closure cost estimates | \$15,559,831 |
| 2. Amount of annual aggregate liability coverage to be demonstrated | \$ 8,000,000 |
| 3. Sum of lines 1 and 2 | <u>\$23,559,831</u> |
| 4. Current bond rating of most recent issuance and name of rating service | Not rated-private placement (Ford's Senior long term debt is rated A- by Standard & Poor's and A1 by Moody's) |
| 5. Date of issuance of bond | Dec. 15, 1984 |
| 6. Date of maturity of bond | Dec. 15, 2004 |
| *7. Tangible net worth | \$ 9,501 Million |
| *8. Total assets in the U.S. | \$ 17,648 Million |
| | <u>YES</u> <u>NO</u> |
| 9. Is line 7 at least \$10 million? | X |
| 10. Is line 7 at least 6 times line 3? | X |
| *11. Are at least 90% of firm's assets located in the U.S.? If not, complete line 12. | X |
| 12. Is line 8 at least 6 times line 3? | X |

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.



W. M. Caldwell
Executive Vice President and
Chief Financial Officer
March 29, 1985

<u>Facility and Address</u>	<u>EPA Region</u>	<u>EPA State/ID No.</u>	<u>Closure Costs</u>	<u>Post Closure Costs</u>	<u>Total</u>
Allen Park Clay Mine Oakwood Boulevard & Southfield Allen Park, MI 48101	V /	MI D980568711	\$ 243,502	\$ 216,036	\$ 459,538
Milan Plastics Plant 800 County Street Milan, MI 48160	V /	MI D091955476	90,877	-	90,877
Monroe Stamping Plant 3200 E. Elm Avenue Monroe, MI 48161	V /	MI D005057005	8,350,700	205,888	8,556,588
Romeo Tractor & Equipment Plant 701 E. 32 Mile Road Romeo, MI 48065	V /	MI D078400165	356,750	-	356,750
Saline Plastics Plant 7700 Michigan Avenue Saline, MI 48176	V /	MI D009305665	650,419	-	650,419
Wixom Assembly Plant 50000 Grand River Expwy. Wixom, MI 48096	V /	MI D005379714	1,800,000	-	1,800,000
		TOTAL	<u>\$11,492,248</u>	<u>\$ 421,924</u>	<u>\$11,914,172</u>

<u>Facility and Address</u>	<u>EPA Region</u>	<u>EPA State/ID No.</u>	<u>Closure Costs</u>	<u>Post Closure Costs</u>	<u>Total</u>
Aeronutronic Division (Ford Aerospace) Ford Road Newport Beach, CA 92663	IX	CA D041330077	21,840	-	21,840
Western Development Labs (Ford Aerospace) 3939 Fabian Way Palo Alto, CA 94303	IX	CA D000030528	37,367	-	37,367
Parker Chemical Co. 32100 Stephensen Hwy. Madison Heights, MI 48071	V	MI D057676124	27,554	-	27,554
Parker Chemical Co. 322 West Main Street Morenci, MI 49256	V	MI D058723867	41,218	-	41,218
Parker Chemical Co. 5640 Knott Avenue Buena Park, CA 90620	IX	CA D060754231	17,009	-	17,009
Parker Chemical Co. 557 Route 23 Wayne (Mountain View), New Jersey 07470	II	NJ D056709421	11,821	-	11,821
Parker Chemical Co. 10800 Baur Boulevard St. Louis, MO 63132	VII	MO D980631345	13,001	-	13,001
		TOTAL	<u>\$ 169,810</u>	-	<u>\$ 169,810</u>

<u>Facility and Address</u>	<u>EPA Region</u>	<u>EPA State/ID No.</u>	<u>Closure Costs</u>	<u>Post Closure Costs</u>	<u>Total</u>
Louisville Assembly Plt Fern Valley Road Louisville, KY 40201	IV	KY D071315899	\$ 296,849	-	\$ 296,849
Kentucky Truck Plant 3001 Chamberlain Lane Louisville, KY 40222	IV	KY D053351227	650,000	-	650,000
Sandusky Plant 3020 Tiffin Road Sandusky, OH 44870	V	OH D004461208	1,296,000	-	1,296,000
Indianapolis Plant 6900 English Avenue Indianapolis, IN 46219	V	IN D001926013	1,233,000	-	1,233,000
		TOTAL	<u>\$3,475,849</u>	-	<u>\$3,475,849</u>



Ford Motor Company

The American Road
P.O. Box 1899
Dearborn, Michigan 48121

March 29, 1985

Regional Administrator
U.S. EPA, Region V
230 South Dearborn Street
Chicago, IL 60604

Guarantee made this March 29, 1985 by Ford Motor Company, a business corporation organized under the laws of the State of Delaware, herein referred to as guarantor, to the United States Environmental Protection Agency (EPA) obligee on behalf of our subsidiary Ford Aerospace & Communications Corporation of P.O. Box 43342, 300 Renaissance Center, Detroit, MI 48243.

Recitals.

1. Guarantor meets or exceeds the financial test criteria and agrees to comply with the reporting requirements for guarantors as specified in 40 CFR 264.143(f), 264.145(f), 265.143(e), and 265.145(e).

2. Ford Aerospace & Communications Corporation owns or operates the following hazardous waste management facilities covered by this guarantee:

<u>Facility and Address</u>	<u>EPA State/ID No.</u>	<u>Closure Costs</u>
Ford Aerospace & Communications Corporation Aeronutronic Division Ford Road Newport Beach, CA 92663	CA D041330077	\$21,840
Ford Aerospace & Communications Corporation Western Development Labs 3939 Fabian Way Palo Alto, CA 94303	CA D000030528	\$37,367

3. "Closure plans" and "post-closure plans" as used below refer to the plans maintained as required by Subpart G of 40 CFR Parts 264 and 265 for the closure and post-closure care of facilities as identified above.

4. For value received from Ford Aerospace & Communications Corporation, guarantor guarantees to EPA that in the event that Ford Aerospace & Communications Corporation fails to perform "closure" of the above facilities in accordance with the closure or post-closure plans and other permit or interim status requirements whenever required to do so, the guarantor shall do so or establish a trust fund as specified in Subpart H of 40 CFR Parts 264 and 265, as applicable, in the name of Ford Aerospace & Communications Corporation in the amount of the current closure or post-closure cost estimates as specified in Subpart H of 40 CFR Parts 264 and 265.

5. Guarantor agrees that if at any time during or at the end of any fiscal year before termination of this guarantee the guarantor fails to meet the financial test criteria, guarantor shall send within 90 days, by certified mail, notice to EPA Regional Administrators for the Regions in which the facilities are located and to Ford Aerospace & Communications Corporation that he or she intends to provide alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 and 265, as applicable, in the name of Ford Aerospace & Communications Corporation. Within 120 days after the end of such fiscal year or other occurrence, the guarantor shall establish such alternate financial assurance unless Ford Aerospace & Communications Corporation has done so.

6. The guarantor agrees to notify the EPA Regional Administrator by certified mail of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code, naming guarantor as debtor within ten days after commencement of the proceeding.

7. Guarantor agrees that within 30 days after being notified by the EPA Regional Administrator of a determination that guarantor no longer meets the financial test criteria or that he or she is disallowed from continuing as a guarantor of closure or post-closure care, he shall establish alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 and 265, as applicable, in the name of Ford Aerospace & Communications Corporation unless Ford Aerospace & Communications Corporation has done so.

8. Guarantor agrees to remain bound under this guarantee notwithstanding any or all of the following: amendment or modification of the closure or post-closure plan, amendment or modification of the permit, the extension or reduction of the time of performance of closure or post-closure or any other modification or alteration of an obligation of the owner or operator pursuant to 40 CFR Parts 264 or 265.

9. Guarantor agrees to remain bound under this guarantee for so long as Ford Aerospace & Communications Corporation must comply with the applicable financial assurance requirements of Subpart H of 40 CFR Parts 264 and 265 for the above-listed facilities, except that guarantor may cancel this guarantee by sending notice by registered or certified mail to the EPA Regional Administrator and to Ford Aerospace & Communications Corporation, such cancellation to become effective no earlier than 120 days after receipt of such notice by both EPA and Ford Aerospace & Communications Corporation, as evidenced by the return receipts.

10. Guarantor agrees that if Ford Aerospace & Communications Corporation fails to provide alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 and 265, as applicable, and obtain written approval of such assurance from the EPA Regional Administrator within 90 days after a notice of cancellation by the guarantor is received by the EPA Regional Administrator from guarantor, guarantor shall provide such alternate financial assurance in the name of Ford Aerospace & Communications Corporation.

11. Guarantor expressly waives notice of acceptance of this guarantee by EPA or by Ford Aerospace & Communications Corporation. Guarantor also expressly waives notice of amendments or modifications of the closure and/or post-closure plan and of amendments or modifications of the facility permit(s).

I hereby certify that the wording of this guarantee is identical to the wording specified in 40 CFR 264.151(h) as such regulation was constituted on the date first written above.

Effective date: March 29, 1985

Ford Motor Company

Name of Guarantor

W. M. Caldwell

Authorized Signature for Guarantor

W. M. Caldwell

Typed or Printed Name

Executive Vice-President and Chief Financial Officer
Title

Susan M. Rozanski

Signature of Witness or Notary and Seal

SUSAN M. ROZANSKI
Notary Public, Wayne County, MI
My Commission Expires Sept. 29, 1985



Ford Motor Company

The American Road
P.O. Box 1899
Dearborn, Michigan 48121

March 29, 1985

Regional Administrator
U.S. EPA, Region V
230 South Dearborn Street
Chicago, IL 60604

Guarantee made this March 29, 1985 by Ford Motor Company, a business corporation organized under the laws of the State of Delaware, herein referred to as guarantor, to the United States Environmental Protection Agency (EPA) obligee on behalf of our subsidiary Parker Chemical Company of 32100 Stephensen Hwy., Madison Hts., MI 48071.

Recitals.

1. Guarantor meets or exceeds the financial test criteria and agrees to comply with the reporting requirements for guarantors as specified in 40 CFR 264.143(f), 264.145(f), 265.143(e), and 265.145(e).

2. Parker Chemical Company owns or operates the following hazardous waste management facilities covered by this guarantee:

<u>Facility and Address</u>	<u>EPA State/ID No.</u>	<u>Closure Costs</u>
Parker Chemical Company 32100 Stephensen Hwy. Madison Heights, MI 48071	MI D057676124	\$27,554
Parker Chemical Company 322 West Main Street Morenci, MI 49256	MI D058723867	\$41,218
Parker Chemical Company 5640 Knott Avenue Buena Park, CA 90620	CA D060754231	\$17,009
Parker Chemical Company 557 Route 23 Wayne (Mountain View), NJ 07470	NJ D056709421	\$11,821
Parker Chemical Company 10800 Baur Boulevard St. Louis, MO 63132	MO D980631345	\$13,001

3. "Closure plans" and "post-closure plans" as used below refer to the plans maintained as required by Subpart G of 40 CFR Parts 264 and 265 for the closure and post-closure care of facilities as identified above.

4. For value received from Parker Chemical Company, guarantor guarantees to EPA that in the event that Parker Chemical Company fails to perform "closure" of the above facilities in accordance with the closure or post-closure plans and other permit or interim status requirements whenever required to do so, the guarantor shall do so or establish a trust fund as specified in Subpart H of 40 CFR Parts 264 and 265, as applicable, in the name of Parker Chemical Company in the amount of the current closure or post-closure cost estimates as specified in Subpart H of 40 CFR Parts 264 and 265.

5. Guarantor agrees that if at any time during or at the end of any fiscal year before termination of this guarantee the guarantor fails to meet the financial test criteria, guarantor shall send within 90 days, by certified mail, notice to EPA Regional Administrators for the Regions in which the facilities are located and to Parker Chemical Company that he or she intends to provide alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 and 265, as applicable, in the name of Parker Chemical Company. Within 120 days after the end of such fiscal year or other occurrence, the guarantor shall establish such alternate financial assurance unless Parker Chemical Company has done so.

6. The guarantor agrees to notify the EPA Regional Administrator by certified mail of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code, naming guarantor as debtor within ten days after commencement of the proceeding.

7. Guarantor agrees that within 30 days after being notified by the EPA Regional Administrator of a determination that guarantor no longer meets the financial test criteria or that he or she is disallowed from continuing as a guarantor of closure or post-closure care, he shall establish alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 and 265, as applicable, in the name of Parker Chemical Company unless Parker Chemical Company has done so.

8. Guarantor agrees to remain bound under this guarantee notwithstanding any or all of the following: amendment or modification of the closure or post-closure plan, amendment or modification of the permit, the extension or reduction of the time of performance of closure or post-closure or any other modification or alteration of an obligation of the owner or operator pursuant to 40 CFR Parts 264 or 265.

9. Guarantor agrees to remain bound under this guarantee for so long as Parker Chemical Company must comply with the applicable financial assurance requirements of Subpart H of 40 CFR Parts 264 and 265 for the above-listed facilities, except that guarantor may cancel this guarantee by sending notice by registered or certified mail to the EPA Regional Administrator and to Parker Chemical Company, such cancellation to become effective no earlier than 120 days after receipt of such notice by both EPA and Parker Chemical Company, as evidenced by the return receipts.

10. Guarantor agrees that if Parker Chemical Company fails to provide alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 and 265, as applicable, and obtain written approval of such assurance from the EPA Regional Administrator within 90 days after a notice of cancellation by the guarantor is received by the EPA Regional Administrator from guarantor, guarantor shall provide such alternate financial assurance in the name of Parker Chemical Company.

11. Guarantor expressly waives notice of acceptance of this guarantee by EPA or by Parker Chemical Company. Guarantor also expressly waives notice of amendments or modifications of the closure and/or post-closure plan and of amendments or modifications of the facility permit(s).

I hereby certify that the wording of this guarantee is identical to the wording specified in 40 CFR 264.151(h) as such regulation was constituted on the date first written above.

Effective date: March 29, 1985

Ford Motor Company

Name of Guarantor

W. M. Caldwell

Authorized Signature for Guarantor

W. M. Caldwell

Typed or Printed Name

Executive Vice-President and Chief Financial Officer
Title

Susan M. Rozanski

Signature of Witness or Notary and Seal

SUSAN M. ROZANSKI

Notary Public, Wayne County, MI

My Commission Expires Sept. 29, 1985



Environmental and Safety Engineering Staff
Ford Motor Company

One Parklane Boulevard
Dearborn, Michigan 48126

January 11, 1985

RECEIVED
JAN 22 1985
WASTE MANAGEMENT
BRANCH

Regional Administrator
US EPA Region V
230 South Dearborn
Chicago, Illinois 60604

Subject: Hazardous Waste Management Financial Requirements

Enclosed is a revised, and signed, original of the letter from the Chief Financial Offices and the Corporate Guananters as required under Subpart H of 40 CFR parts 264 and 265. The revisions were called to our attention by California and are submitted to you to assure consistency.

We will be refiling in March, 90 days after the close of our fiscal year.

For any questions, please contact me directly at 313-337-8136.

Sincerely,

J. L. Tatum

8/JLT251/1h

RECEIVED

JAN 18 1985
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR



Ford Motor Company

The American Road
P.O. Box 1899
Dearborn, Michigan 48121

January 7, 1985

Regional Administrator
U.S. EPA, Region V
230 South Dearborn Street
Chicago, IL 60604

Subject: Hazardous Waste Management Financial Requirements

I am the chief financial officer of

Ford Motor Company
The American Road
Dearborn, Michigan 48121

This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care, as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

See Attachment A.

specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of Ford Aerospace and Communications Corporation. Within 120 days after the end of such fiscal year, the guarantor shall establish such financial assurance unless Ford Aerospace and Communications Corporation has done so.

6. The guarantor agrees to notify the EPA Regional Administrator by certified mail, of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code, naming guarantor as debtor, within 10 days after commencement of the proceeding.

7. Guarantor agrees that within 30 days after being notified by an EPA Regional Administrator of a determination that guarantor no longer meets the financial test criteria or that he is disallowed from continuing as a guarantor of closure or post-closure care, he shall establish alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of Ford Aerospace and Communications Corporation unless Ford Aerospace and Communications Corporation has done so.

8. Guarantor agrees to remain bound under this guarantee notwithstanding any or all of the following: amendment or modification of the closure or post-closure plan, amendment or modification of the permit, the extension or reduction of the time of performance of closure or post-closure, or any other modification or alteration of an obligation of the owner or operator pursuant to 40 CFR Parts 264 or 265.

9. Guarantor agrees to remain bound under this guarantee for so long as Ford Aerospace and Communications Corporation must comply with the applicable financial assurance requirements of Subpart H of 40 CFR Parts 264 and 265 for the above-listed facilities, except that guarantor may cancel this guarantee by sending notice by certified mail to the EPA Regional Administrator(s) for the Region(s) in which the facility(ies) is (are) located and to Ford Aerospace and Communications Corporation, such cancellation to become effective no earlier than 120 days after receipt of such notice by both EPA and Ford Aerospace and Communications Corporation, as evidenced by the return receipts.

10. Guarantor agrees that if Ford Aerospace and Communications Corporation fails to provide alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, and obtain written approval of such assurance from the EPA Regional Administrator(s) within 90 days after a notice of cancellation by the guarantor is received by an EPA Regional Administrator from guarantor, guarantor shall provide such alternate financial assurance in the name of Ford Aerospace and Communications Corporation.

11. Guarantor expressly waives notice of acceptance of this guarantee by the EPA or by Ford Aerospace and Communications Corporation. Guarantor also expressly waives notice of amendments or modifications of the closure and/or post-closure plan and of amendments or modifications of the facility permit(s).

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.


The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1983.

Part B: Closure or Post-Closure Care and Liability Coverage

(Alternative II)

- | | |
|---|---|
| 1. Sum of current closure and post-closure cost estimates | \$10,070,355 |
| 2. Amount of annual aggregate liability coverage to be demonstrated | \$ 8,000,000 |
| 3. Sum of lines 1 and 2 | <u>\$18,070,355</u> |
| 4. Current bond rating of most recent issuance and name of rating service | Not rated-private placement (Ford's Senior long term debt is rated BBB+ by Standard & Poor's and A3 by Moody's) |
| 5. Date of issuance of bond | Dec. 15, 1983 |
| 6. Date of maturity of bond | Dec. 15, 2003 |
| *7. Tangible net worth | \$ 7,259 Million |
| *8. Total assets in the U.S. | \$ 13,229 Million |
| | <u>YES</u> <u>NO</u> |
| 9. Is line 7 at least \$10 million? | X |
| 10. Is line 7 at least 6 times line 3? | X |
| *11. Are at least 90% of firm's assets located in the U.S.? If not, complete line 12. | X |
| 12. Is line 8 at least 6 times line 3? | X |

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.



W. M. Caldwell
Executive Vice President and
Chief Financial Officer

Attachment A

<u>Facilities</u>	<u>EPA Region</u>	<u>EPA State/ID No.</u>	<u>Liability Coverage</u>	
			<u>Sudden & Accidental \$(Mills)</u>	<u>Non-Sudden^{a/} & Gradual \$(Mills)</u>
Allen Park Clay Mine Oakwood Boulevard & Southfield Allen Park, MI 48101	V	MI D980568711	2	6
Milan Plastics Plant 800 County Street Milan, MI 48160	V	MI D091055476	2	
Monroe Stamping Plant 3200 E. Elm Avenue Monroe, MI 48161	V	MI D005057005	2	6
Romeo Tractor & Equipment Plant 701 E. 32 Mile Road Romeo, MI 48065	V	MI D078400165	2	6
Saline Plastics Plant 7700 Michigan Avenue Saline, MI 48176	V	MI D009305665	2	6
Louisville Assembly Plant Fern Valley Road Louisville, KY 40201	IV	KY D071315899	2	10
Ford Aerospace & Communications Corporation Aeronutronic Division Ford Road Newport Beach, CA 92663	IX	CA D041330077	2	
Ford Aerospace & Communications Corporation Western Development Labs 3939 Fabian Way Palo Alto, CA 94303	IX	CA D000030528	2	
Parker Chemical Company 32100 Stephensen Hwy. Madison Heights, MI 48071	V	MI D057676124	2	
Parker Chemical Company 322 West Main Street Morenci, MI 49256	V	MI D058723867	2	

<u>Facilities</u>	<u>EPA Region</u>	<u>EPA State/ID No.</u>	<u>Liability Coverage</u>	
			<u>Sudden & Accidental</u> \$(Mills)	<u>Non-Sudden & Gradual</u> \$(Mills) ^{a/}
Parker Chemical Company 5640 Knott Avenue Buena Park, CA 90620	IX	CA D060754231	2	
Parker Chemical Company 557 Route 23 Wayne (Mountain View), New Jersey 07470	II	NJ D056709421	2	
Parker Chemical Company 10800 Baur Boulevard St. Louis, MO 63132	VII	MO D057748063	2	

a/ 40 CFR 265.147(b) surface impoundment, landfill or land treatment facility.

Attachment 1

<u>Facility and Address</u>	<u>EPA Region</u>	<u>EPA State/ID No.</u>	<u>Closure Costs</u>	<u>Post Closure Costs</u>	<u>Total</u>
Allen Park Clay Mine Oakwood Boulevard & Southfield Allen Park, MI 48101	V	MI D980568711	\$ 234,137	\$ 201,994	\$ 436,131
Milan Plastics Plant 800 County Street Milan, MI 48160	V	MI D091055476	87,382	-	87,382
Monroe Stamping Plant 3200 E. Elm Avenue Monroe, MI 48161	V	MI D005057005	7,000,000	550,000	7,550,000
Romeo Tractor & Equipment Plant 701 E. 32 Mile Road Romeo, MI 48065	V	MI D078400165	385,434	-	385,434
Saline Plastics Plant 7700 Michigan Avenue Saline, MI 48176	V	MI D009305665	1,160,000	-	1,160,000
		TOTAL	<u>\$8,866,953</u>	<u>\$ 751,994</u>	<u>\$9,618,947</u>

Attachment 2

<u>Facility and Address</u>	<u>EPA Region</u>	<u>EPA State/ID No.</u>	<u>Closure Costs</u>	<u>Post Closure Costs</u>	<u>Total</u>
Parker Chemical Company 32100 Stephensen Hwy. Madison Heights, MI 48071	V	MI D057676124	26,494	-	26,494
Parker Chemical Company 322 West Main Street Morenci, MI 49256	V	MI D058723867	39,633	-	39,633
Parker Chemical Company 5640 Knott Avenue Buena Park, CA 90620	IX	CA D060754231	16,355	-	16,355
Parker Chemical Company 557 Route 23 Wayne (Mountain View), New Jersey 07470	II	NJ D056709421	11,366	-	11,366
Parker Chemical Company 10800 Baur Boulevard St. Louis, MO 63132	VII	MO D057748063	12,501	-	12,501
Ford Aerospace and Communications Corporation Aeronutronic Division Ford Road Newport Beach, CA 92663	IX	CA D041330077	21,000	-	21,000
Ford Aerospace and Communications Corporation Western Development Labs 3939 Fabian Way Palo Alto, CA 94303	IX	CA D000030528	34,920	-	34,920
		TOTAL	<u>\$ 162,269</u>	-	<u>\$ 162,269</u>

Attachment 3

<u>Facility and Address</u>	<u>EPA Region</u>	<u>EPA State/ID No.</u>	<u>Closure Costs</u>	<u>Post Closure Costs</u>	<u>Total</u>
Louisville Assembly Plt Fern Valley Road Louisville, KY 40201	IV	KY D071315899	\$ 289,139	-	\$ 289,139
		TOTAL	<u>\$ 289,139</u>	-	<u>\$ 289,139</u>



Ford Motor Company

The American Road
P.O. Box 1899
Dearborn, Michigan 48121

March 30, 1984

Regional Administrator
U.S. EPA, Region V
230 South Dearborn Street
Chicago, IL 60604

Subject: Hazardous Waste Management Financial Requirements

I am the chief financial officer of

Ford Motor Company
The American Road
Dearborn, Michigan 48121

This letter is in support of the use of the financial test to demonstrate financial assurance for liability coverage and closure and/or post-closure care, as specified in Subpart H of 40 CFR Parts 264 and 265.

see inside list

RECEIVED
APR 05 1984
WASTE MANAGEMENT
BRANCH

[Faint, illegible handwritten notes]

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

See Attachment 1

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

See Attachment 2

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

See Attachment 3

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

None

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1983.

Part B: Closure or Post-Closure Care and Liability Coverage

(Alternative II)

- | | |
|---|---|
| 1. Sum of current closure and post-closure cost estimates | \$10,070,355 |
| 2. Amount of annual aggregate liability coverage to be demonstrated | \$ 8,000,000 |
| 3. Sum of lines 1 and 2 | <u>\$18,070,355</u> |
| 4. Current bond rating of most recent issuance and name of rating service | Not rated-private placement (Ford's Senior long term debt is rated BBB+ by Standard & Poor's and A3 by Moody's) |
| 5. Date of issuance of bond | Dec. 15, 1983 |
| 6. Date of maturity of bond | Dec. 15, 2003 |
| *7. Tangible net worth | \$ 7,259 Million |
| *8. Total assets in the U.S. | \$ 13,229 Million |
| | <u>YES</u> <u>NO</u> |
| 9. Is line 7 at least \$10 million? | X |
| 10. Is line 7 at least 6 times line 3? | X |
| *11. Are at least 90% of firm's assets located in the U.S.? If not, complete line 12. | X |
| 12. Is line 8 at least 6 times line 3? | X |

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.



W. M. Caldwell
Executive Vice President and
Chief Financial Officer
March 30, 1984

<u>Facility and Address</u>	<u>EPA Region</u>	<u>EPA State/ID No.</u>	<u>Closure Costs</u>	<u>Post Closure Costs</u>	<u>Total</u>
Allen Park Clay Mine Oakwood Boulevard & Southfield Allen Park, MI 48101	V	MI D980568711 <i>maj, Part B</i>	\$ 234,137	\$ 201,994	\$ 436,131 ✓
Milan Plastics Plant 800 County Street Milan, MI 48160	V	MI D091055476 <i>Part B</i>	- 87,382	-	87,382
Monroe Stamping Plant 3200 E. Elm Avenue Monroe, MI 48161	V	MI D005057005 <i>maj, Part B</i>	7,000,000	550,000	7,550,000 ✓
Romeo Tractor & Equipment Plant 701 E. 32 Mile Road Romeo, MI 48065	V	MI D078400165 <i>Maj</i>	385,434	-	385,434 ✓
Saline Plastics Plant 7700 Michigan Avenue Saline, MI 48176	V	MI D009305665 <i>Maj</i>	1,160,000	-	1,160,000 ✓
TOTAL			<u>\$8,866,953</u>	<u>\$ 751,994</u>	<u>\$9,618,947</u>

ATTACHMENT 2

<u>Facility and Address</u>	<u>EPA Region</u>	<u>EPA State/ID No.</u>	<u>Closure Costs</u>	<u>Post Closure Costs</u>	<u>Total</u>
Parker Chemical Co. 32100 Stephensen Hwy. Madison Heights, MI 48071	V	MI D057676124	26,494	-	26,494 ✓
Parker Chemical Co. 322 West Main Street Morenci, MI 49256	V	MI D058723867	39,633	-	39,633
		TOTAL	<u>\$ 66,127</u>	-	<u>\$ 66,127</u>

<u>Facility and Address</u>	<u>EPA Region</u>	<u>EPA State/ID No.</u>	<u>Closure Costs</u>	<u>Post Closure Costs</u>	<u>Total</u>
Louisville Assembly Plt Fern Valley Road Louisville, KY 40201	IV	KY D071315899	\$ 289,139	-	\$ 289,139
Aeronutronic Division (Ford Aerospace) Ford Road Newport Beach, CA 92663	IX	CA D041330077	21,000	-	21,000
Western Development Labs (Ford Aerospace) 3939 Fabian Way Palo Alto, CA 94303	IX	CA D000030528	34,920	-	34,920
Parker Chemical Co. 5640 Knott Avenue Buena Park, CA 90620	IX	CA D060754231	16,355	-	16,355
Parker Chemical Co. 557 Route 23 Wayne (Mountain View), New Jersey 07470	II	NJ D056709421	11,366	-	11,366
Parker Chemical Co. 10800 Baur Boulevard St. Louis, MO 63132	VII	MO D057748063	12,501	-	12,501
		TOTAL	<u>\$ 385,281</u>	-	<u>\$ 385,281</u>

Coopers
& Lybrand

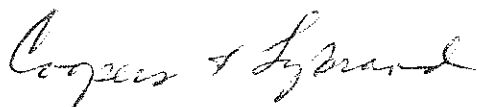
certified public accountants

Ford Motor Company
Dearborn, Michigan

We have examined the consolidated financial statements of Ford Motor Company and Consolidated Subsidiaries for the year ended December 31, 1983, and have issued our report thereon dated February 10, 1984. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

Mr. W. M. Caldwell, Ford Motor Company Executive Vice President and Chief Financial Officer, stated in letters dated March 29, 1984 to the California Hazardous Waste Management Branch Chief, the New Jersey Department of Environmental Protection Commissioner, the United States Environmental Protection Agency Regional Administrator (Region V), the Missouri Department of Natural Resources Waste Management Programs and the Kentucky Division of Waste Management Director that tangible net worth and total assets in the United States at December 31, 1983 aggregated \$7,259 million and \$13,229 million, respectively, and that such assets in the United States were less than 90 percent of total assets. We have compared this data with corresponding data which we have derived from the financial statements referred to above.

In connection with the aforementioned procedure, no matters came to our attention which caused us to believe that the data specified above should be adjusted.



Coopers & Lybrand
400 Renaissance Center
Detroit, Michigan 48243
March 29, 1984



V. H. Sussman, Director
Stationary Source Environmental Control
Environmental and Safety Engineering

Ford Motor Company
One Parklane Boulevard
Dearborn, Michigan 48126

October 5, 1983

Regional Administrator
U.S. EPA, Region V
230 South Dearborn Street
Chicago, IL 60604

Chief
Hazardous Waste Management Branch
California State Department of
Health Services
744 P Street
Sacramento, CA 95814

Subject: Revisions to Hazardous Waste Management Financial Test

The attached RCRA financial document reflects the recent acquisition by Ford Motor Company of the Parker Chemical Company and its five (5) RCRA Interim Status facilities which store hazardous wastes for longer than 90 days.

Kindly substitute the attached demonstration for the one submitted to you on June 24, 1983, which is superseded by this submittal. We would appreciate return of the original document if that is possible.

Sincerely,

V. H. Sussman

1/32/D
Attachment

RECEIVED
OCT 11 1983
WASTE MANAGEMENT
BRANCH

7



Ford Motor Company
Environmental and Safety
Engineering Staff

One Parklane Boulevard
Dearborn, Michigan 48126

September 29, 1983

Chief
Hazardous Waste Management Branch
California State Department of
Health Services
744 P Street
Sacramento, CA 95814

Regional Administrator
U.S. EPA, Region V
230 South Dearborn Street
Chicago, IL 60604

Commissioner
New Jersey Department of
Environmental Protection
32 E. Hanover Street, CN027
Trenton, New Jersey 08625

Region Administrator
U.S. EPA, Region VII
324 East Eleventh Street
Kansas City, MO 64106

Subject: Hazardous Waste Management Financial Requirements

I am the chief financial officer of Ford Motor Company, the American Road, Dearborn, Michigan 48121. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

<u>Facility & Address</u>	<u>Region</u>	<u>EPA I.D. Number</u>	<u>RCRA Closure Costs</u>	<u>RCRA Post Closure Costs</u>	<u>Totals</u>
Allen Park Clay Mine Oakwood Boulevard & Southfield Allen Park, MI 48101	V	MID980568711	\$ 220,884	\$190,560	\$ 411,444
Milan Plastics Plant 800 County Street Milan, MI 48160	V	MID091855476	84,021	-	84,021
Monroe Stamping Plant 3200 E. Elm Avenue Monroe, MI 48161	V	MID005057005	7,000,000	550,000	7,550,000
Romeo Tractor & Equipment Plant 701 E. 32 Mile Road Romeo, MI 48065	V	MID078400165	15,000	-	15,000
Saline Plastics Plt. 7700 Michigan Avenue Saline, MI 48176	V	MID009305665	1,160,000	-	1,160,000
Total:			\$8,479,905	\$740,560	\$9,220,465

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

<u>Facility & Address</u>	<u>Region</u>	<u>EPA I.D. Number</u>	<u>RCRA Closure Costs</u>	<u>RCRA Post Closure Costs</u>	<u>Totals</u>
Parker Chemical Co. 32100 Stephensen Hwy. Madison Heights, MI 48071	V	MID057676124	\$26,494	-	\$26,494
Parker Chemical Co. 322 West Main Street Morenci, MI 49256	V	MID058723867	39,633	-	39,633
Total:			\$66,127	-	\$66,127

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

<u>Facility & Address</u>	<u>Region</u>	<u>EPA I.D. Number</u>	<u>RCRA Closure Costs</u>	<u>RCRA Post Closure Costs</u>	<u>Totals</u>
Louisville Assembly Plant Fern Valley Road Louisville, KY 40201	IV	KYD071315899	\$267,721	\$ -	\$267,721
Aeronutronic Division (Ford Aerospace) Ford Road Newport Beach, CA 92663	IX	CAD041330077	21,000	-	21,000
Western Development Labs (Ford Aerospace) 3939 Fabian Way Palo Alto, CA 94303	IX	CAD000030528	34,920	-	34,920
Parker Chemical Co. 5640 Knott Avenue Buena Park, CA 90620	IX	CAD060754231	16,355	-	16,355
Parker Chemical Co. 557 Route 23 Wayne(Mountain View) New Jersey 07470	II	NJD056709421	11,366	-	11,366
Parker Chemical Co. 10800 Baur Boulevard St. Louis, MO 63132	VII	MOD057748063	12,501	-	12,501
Total:			\$363,863	-	\$363,863

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None

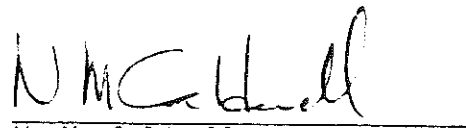
This firm is required to file a Form 10K with the Securities and Exchange Commission for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1982.

(Alternative II)

- | | | | |
|-----|--|--|-----------|
| 1. | Sum of current closure and post-closure cost estimates (total of ALL cost estimates shown in the four paragraphs above) | \$9,650,455 | |
| 2. | Current bond rating of most recent issuance of this firm and name of rating service | BBB+ (Standard & Poor's Corp.)
Baa-2 (Moody's Investors Svc.) | |
| 3. | Date of issuance of bond | Nov. 15, 1982 | |
| 4. | Date of maturity of bond | Nov. 15, 1988 | |
| *5. | Tangible net worth (if any portion of the closure and post-closure cost estimates is included in "total liabilities" on your firm's financial statements, you may add the amount of that portion to this line) | \$5,798 million | |
| *6. | Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.) | \$11,410 million | |
| 7. | Is line 5 at least \$10 million? | <u>Yes</u>
X | <u>No</u> |
| 8. | Is line 5 at least 6 times line 1? | X | |
| *9. | Are at least 90% of firm's assets located in the U.S.? If not, complete line 10. | | X |
| 10. | Is line 6 at least 6 times line 1? | X | |

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

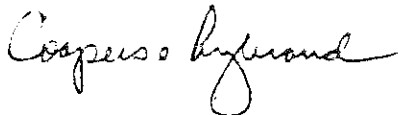

W. M. Caldwell
Executive Vice President and
Chief Financial Officer

Ford Motor Company
Dearborn, Michigan

We have examined the consolidated financial statements of Ford Motor Company and Consolidated Subsidiaries for the year ended December 31, 1982, and have issued our report thereon dated February 11, 1983. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

Mr. W. M. Caldwell, Ford Motor Company Executive Vice President and Chief Financial Officer, stated in a letter dated September 29, 1983 to the California Hazardous Waste Management Branch Chief, the New Jersey Department of Environmental Protection Commissioner and the United States Environmental Protection Agency Regional Administrator (Regions V and VII) that the data on page 4, items 5, 6 and 9 of that letter had been derived from the financial statements referred to above. We have compared that data with corresponding data which we have derived from such financial statements.

In connection with the aforementioned procedure, no matters came to our attention which caused us to believe that the specified data should be adjusted.



Coopers & Lybrand
400 Renaissance Center
Detroit, Michigan 48243
September 29, 1983

MID 980 568711



Ford Motor Company
Environmental and Safety
Engineering Staff

One Parklane Boulevard
Dearborn, Michigan 48126

September 29, 1983

Chief
Hazardous Waste Management Branch
California State Department of
Health Services
744 P Street
Sacramento, CA 95814

Regional Administrator
U.S. EPA, Region V
230 South Dearborn Street
Chicago, IL 60604

Commissioner
New Jersey Department of
Environmental Protection
32 E. Hanover Street, CN027
Trenton, New Jersey 08625

Region Administrator
U.S. EPA, Region VII
324 East Eleventh Street
Kansas City, MO 64106

Subject: Hazardous Waste Management Financial Requirements

I am the chief financial officer of Ford Motor Company, the American Road, Dearborn, Michigan 48121. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

Working copy

Do they have new signature authority? Ask him.

Joe Boyle has it? Pat V. has it? or Ron J.

<u>Facility & Address</u>	<u>Region</u>	<u>EPA I.D. Number</u>	<u>RCRA Closure Costs</u>	<u>RCRA Post Closure Costs</u>	<u>Totals</u>
✓ Allen Park Clay Mine Oakwood Boulevard & Southfield Allen Park, MI 48101	V	MID980568711 <i>put letter in folder</i>	\$ 220,884	\$190,560	\$ 411,444
✓ Milan Plastics Plant 800 County Street Milan, MI 48160	V	MID091855476 <i>MID-091-855-476</i>	84,021	-	84,021
✓ Monroe Stamping Plant 3200 E. Elm Avenue Monroe, MI 48161	V	MID005057005	7,000,000	550,000	7,550,000
✓ Romeo Tractor & Equipment Plant 701 E. 32 Mile Road Romeo, MI 48065	V	MID078400165	15,000	-	15,000
✓ Saline Plastics Plt. 7700 Michigan Avenue Saline, MI 48176	V	MID009305665	1,160,000	-	1,160,000
Total:			\$8,479,905	\$740,560	\$9,220,465

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

Collier has it? 6-26-84

<u>Facility & Address</u>	<u>Region</u>	<u>EPA I.D. Number</u>	<u>RCRA Closure Costs</u>	<u>RCRA Post Closure Costs</u>	<u>Totals</u>
✓ Parker Chemical Co. 32100 Stephensen Hwy. Madison Heights, MI 48071	V	MID057676124	\$26,494	-	\$26,494
✓ Parker Chemical Co. 322 West Main Street Morenci, MI 49256	V	MID058723867	39,633	-	39,633
Total:			\$66,127	-	\$66,127

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

<u>Facility & Address</u>	<u>Region</u>	<u>EPA I.D. Number</u>	<u>RCRA Closure Costs</u>	<u>RCRA Post Closure Costs</u>	<u>Totals</u>
Louisville Assembly Plant Fern Valley Road Louisville, KY 40201	IV	KYD071315899	\$267,721	\$ -	\$267,721
Aeronutronic Division (Ford Aerospace) Ford Road Newport Beach, CA 92663	IX	CAD041330077	21,000	-	21,000
Western Development Labs (Ford Aerospace) 3939 Fabian Way Palo Alto, CA 94303	IX	CAD000030528	34,920	-	34,920
Parker Chemical Co. 5640 Knott Avenue Buena Park, CA 90620	IX	CAD060754231	16,355	-	16,355
Parker Chemical Co. 557 Route 23 Wayne(Mountain View) New Jersey 07470	II	NJD056709421	11,366	-	11,366
Parker Chemical Co. 10800 Baur Boulevard St. Louis, MO 63132	VII	MOD057748063	12,501	-	12,501
Total:			\$363,863	-	\$363,863

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None


This firm is required to file a Form 10K with the Securities and Exchange Commission for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1982.

(Alternative II)

- | | | | |
|-----|--|--|-----------|
| 1. | Sum of current closure and post-closure cost estimates (total of ALL cost estimates shown in the four paragraphs above) | \$9,650,455 | |
| 2. | Current bond rating of most recent issuance of this firm and name of rating service | BBB+ (Standard & Poor's Corp.)
Baa-2 (Moody's Investors Svc.) | |
| 3. | Date of issuance of bond | Nov. 15, 1982 | |
| 4. | Date of maturity of bond | Nov. 15, 1988 | |
| *5. | Tangible net worth (if any portion of the closure and post-closure cost estimates is included in "total liabilities" on your firm's financial statements, you may add the amount of that portion to this line) | \$5,798 million | |
| *6. | Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.) | \$11,410 million | |
| | | <u>Yes</u> | <u>No</u> |
| 7. | Is line 5 at least \$10 million? | X | |
| 8. | Is line 5 at least 6 times line 1? | X | |
| *9. | Are at least 90% of firm's assets located in the U.S.? If not, complete line 10. | | X |
| 10. | Is line 6 at least 6 times line 1? | X | |

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.



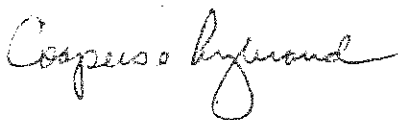
W. M. Caldwell
Executive Vice President and
Chief Financial Officer

Ford Motor Company
Dearborn, Michigan

We have examined the consolidated financial statements of Ford Motor Company and Consolidated Subsidiaries for the year ended December 31, 1982, and have issued our report thereon dated February 11, 1983. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

Mr. W. M. Caldwell, Ford Motor Company Executive Vice President and Chief Financial Officer, stated in a letter dated September 29, 1983 to the California Hazardous Waste Management Branch Chief, the New Jersey Department of Environmental Protection Commissioner and the United States Environmental Protection Agency Regional Administrator (Regions V and VII) that the data on page 4, items 5, 6 and 9 of that letter had been derived from the financial statements referred to above. We have compared that data with corresponding data which we have derived from such financial statements.

In connection with the aforementioned procedure, no matters came to our attention which caused us to believe that the specified data should be adjusted.



Coopers & Lybrand
400 Renaissance Center
Detroit, Michigan 48243
September 29, 1983



MID980568711

Ford Motor Company
Environmental and Safety
Engineering Staff

One Parklane Boulevard
Dearborn, Michigan 48126

Chief
Hazardous Waste Management Branch
California State Department of Health Services
744 P Street
Sacramento, CA 95814

June 24, 1983

Regional Administrator
U.S. EPA, Region V
230 South Dearborn Street
Chicago, IL 60604

I am the chief financial officer of Ford Motor Company, The American Road, Dearborn, Michigan 48121. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

Facility & Address	Region	EPA I.D. Number	RCRA Closure Costs	RCRA Post Closure Costs	Totals
Allen Park Clay Mine V Oakwood Blvd. & Southfield Allen Park, MI 48101		MID980568711	\$ 220,884	\$190,560	\$ 411,444
Milan Plastics Plant V 800 County St. Milan, MI 48160		MID091955476	84,021	-	84,021
Monroe Stamping Plant V 3200 E. Elm Ave. Monroe, MI 48161		MID005057005	7,000,000	550,000	7,550,000
Romeo Tractor & Equipment Plant V 701 E. 32 Mile Rd. Romeo, MI 48065		MID078400165	15,000	-	15,000
Saline Plastics Plant V 7700 Michigan Ave. Saline, MI 48176		MID009305665	1,160,000	-	1,160,000
Total			\$8,479,905	\$740,560	\$9,220,465

June 24, 1983

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

<u>Facility & Address</u>	<u>Region</u>	<u>EPA I.D. Number</u>	<u>RCRA Closure Costs</u>	<u>RCRA Post Closure Costs</u>	<u>Totals</u>
Louisville Assembly Plant Fern Valley Rd. Louisville, KY 40201	IV	KYD071315899	\$267,721	\$ -	\$ 267,721
Aeronutronic Division (Ford Aerospace) Ford Rd. Newport Beach, CA 92663	IX	CAD041330077	21,000	-	21,000
Western Development Labs 3939 Fabian Way Palo Alto, CA 94303	IX	CAD000030528	34,920	-	34,920
Total			\$323,641	\$ -	\$ 323,641

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None


This firm is required to file a Form 10K with the Securities and Exchange Commission for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1982.

(Alternative II)

- | | | |
|-----|---|--|
| 1. | Sum of current closure and post-closure cost estimates
(total of ALL cost estimates shown in the four paragraphs
above) | \$ 9,554,106 |
| 2. | Current bond rating of most recent issuance of this firm
and name of rating service | BBB+ (Standard
& Poor's Corp.)
Baa-2 (Moody's
Investors Svc.) |
| 3. | Date of issuance of bond | Nov. 15, 1982 |
| 4. | Date of maturity of bond | Nov. 15, 1988 |
| *5. | Tangible net worth (if any portion of the closure and
post-closure cost estimates is included in "total
liabilities" on your firm's financial statements, you
may add the amount of that portion to this line) | \$ 5,798 million |
| *6. | Total assets in U.S. (required only if less than 90% of
firm's assets are located in the U.S.) | \$11,410 million |
| | | <u>Yes</u> <u>No</u> |
| 7. | Is line 5 at least \$10 million? | X |
| 8. | Is line 5 at least 6 times line 1? | X |
| *9. | Are at least 90% of firm's assets located in the U.S.?
If not, complete line 10. | X |
| 10. | Is line 6 at least 6 times line 1? | X |

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.



W.M. Caldwell
Executive Vice President and
Chief Financial Officer
6/24/83

Date

HJP/jb

Ford Motor Company
Dearborn, Michigan

We have examined the consolidated financial statements of Ford Motor Company and Consolidated Subsidiaries for the year ended December 31, 1982, and have issued our report thereon dated February 11, 1983. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

Mr. W. M. Caldwell, Ford Motor Company Executive Vice President and Chief Financial Officer, stated in a letter dated June 24, 1983, to the California Hazardous Waste Management Branch Chief and the United States Environmental Protection Agency Regional Administrator that the data on page 3, items 5, 6 and 9 of that letter had been derived from the financial statements referred to above. We have compared that data with corresponding data which we have derived from such financial statements.

In connection with the aforementioned procedure, no matters came to our attention which caused us to believe that the specified data should be adjusted.



Coopers & Lybrand
400 Renaissance Center
Detroit, Michigan 48243
June 24, 1983

Auditors' Opinion

Financial Responsibility

To the Board of Directors and Stockholders
of Ford Motor Company:

We have examined the consolidated balance sheet of Ford Motor Company and Consolidated Subsidiaries as of December 31, 1982 and 1981, and the related consolidated statements of income, stockholders' equity and changes in financial position for each of the three years in the period ended December 31, 1982. Our examinations were made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

In our opinion, the financial statements referred to above present fairly the consolidated financial position of Ford Motor Company and Consolidated Subsidiaries at December 31, 1982 and 1981, and the consolidated results of operations and changes in financial position for each of the three years in the period ended December 31, 1982, in conformity with generally accepted accounting principles consistently applied during the period except for the change, with which we concur, in the method of accounting for foreign-currency translation, as described in Note 1 of Notes to Financial Statements.

Coopers & Lybrand

Coopers & Lybrand
400 Renaissance Center
Detroit, Michigan 48243
(313) 446-7100
February 11, 1983

Management is responsible for the preparation of the Company's financial statements and the other financial information in this report. This responsibility includes maintaining the integrity and objectivity of the financial records and the presentation of the Company's financial statements in accordance with generally accepted accounting principles.

The Company maintains a system of internal controls designed to provide reasonable assurance that its records include the transactions of its operations in all material respects and to provide protection against significant misuse or loss of Company assets. The internal control system is supported by a staff of internal auditors who employ thorough auditing programs, by careful selection and training of financial management personnel, and by written procedures that communicate the details of the control system to the Company's worldwide activities.

The Company's financial statements have been examined by Coopers & Lybrand, independent certified public accountants. Their examination was made in accordance with generally accepted auditing standards which included a review of the internal control system. The Auditors' Opinion appears on this page.

The Board of Directors, acting through its Audit Committee composed solely of directors who are not employees of the Company, is responsible for determining that management fulfills its responsibilities in the preparation of financial statements and the financial control of operations. The Audit Committee appoints the independent public accountants subject to ratification by the stockholders. It meets regularly with management, internal auditors and independent accountants. The independent accountants have full and free access to the Audit Committee and meet with it to discuss their audit work, the Company's internal controls and financial reporting matters.

Supplementary Disclosures

Worldwide Sales and Operating Income by Line of Business

(dollar amounts in millions)

	1982		1981		1980	
	Amount	Percent	Amount	Percent	Amount	Percent
Sales						
Automotive	\$33,683	91%	\$34,673	91%	\$33,303	90%
All Other*	3,384	9	3,574	9	3,783	10
Total	\$37,067	100%	\$38,247	100%	\$37,086	100%
Operating Income (Loss)						
Automotive	\$ (361)	(75)%	\$(1,246)	(99)%	\$(2,179)	(96)%
All Other*	(123)	(25)	(10)	(1)	(99)	(4)
Total	\$ (484)	(100)%	\$(1,256)	(100)%	\$(2,278)	(100)%

*All Other category includes the nonautomotive products of Rouge Steel Company, Tractor Operations, Glass Division and Ford Aerospace & Communications Corporation.



Ford Motor Company
Environmental and Safety
Engineering Staff

One Parklane Boulevard
Dearborn, Michigan 48126

Regional Administrator
U.S. EPA, Region V
230 South Dearborn Street
Chicago, IL 60604
Attention: RCRA Financial Requirements

January 14, 1983

Subject: RCRA Liability Coverage for Non-Sudden Accidental Occurrences

Reference: 47 Fed. Reg. 16544 of April 16, 1982

Dear Administrator:

As required by regulations promulgated in the Federal Register referenced above, we enclose herewith the following documents specified in Section 265.147(f).

- 1) A letter to you signed by the Chief Financial Officer of Ford Motor Company and dated January 14, 1983. It demonstrates Ford Motor Company's passing of the specified financial test.
- 2) A copy of the independent certified public accountant's report on examination of the owner's operator's financial statements for the latest completed fiscal year. This is shown on page 34 of the Company's 1981 Annual Report.
- 3) A special report from the independent certified public accountant.

A copy of the attached documents is being sent to the Michigan Department of Natural Resources.

Yours very truly,

A.B.M. Houston

A.B.M. Houston, Manager
Compliance & Liaison Department
Stationary Source Environmental
Control Office
(313) 594-0324

jb
Enclosure
cc: Michigan Department of Natural Resources

RECEIVED

JAN 18 1983

WASTE MANAGEMENT BRANCH
EPA, REGION V



Ford Motor Company
Environmental and Safety
Engineering Staff

One Parklane Boulevard
Dearborn, Michigan 48126

Regional Administrator
U.S. EPA, Region V
230 South Dearborn Street
Chicago, IL 60604

January 14, 1983

Gentlemen:

Subject: Letter from Chief Financial Officer
to Demonstrate Liability Coverage

I am the chief financial officer of Ford Motor Company, the American Road, Dearborn, Michigan 48121. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

<u>Location</u>	<u>EPA I.D. No.</u>
1. Ford Motor Company Monroe Plant 3200 E. Elm Street Monroe, MI 48161	MID005057005 ✓
2. Ford Motor Company Saline Plastics Plant 7700 Michigan Saline, MI 48176	MID009305665
3. Ford Motor Company Allen Park Clay Mine Landfill 3001 Miller Road Dearborn, MI 48121	MID980568711 M

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1981.


Part A. Liability Coverage for Accidental Occurrences

Alternative II

- | | | | |
|-----|---|----------|--|
| 1. | Amount of annual aggregate liability coverage to be demonstrated | | \$6 million |
| 2. | Current bond rating of most recent issuance and name of rating | | BBB+ (Standard & Poor's Corp.)
Baa-2 (Moody's Investors Svc.) |
| 3. | Date of issuance of bond | | Nov. 15, 1982 |
| 4. | Date of maturity of bond | | Nov. 15, 1988 |
| *5. | Tangible net worth | | \$7,083 million |
| *6. | Total assets in U.S. (required only if less than 90% of assets are located in the U.S.) | | \$11,533 million |
| | | YES | NO |
| 7. | Is line 5 at least \$10 million? | <u>x</u> | — |
| 8. | Is line 5 at least 6 times line 1? | <u>x</u> | — |
| *9. | Are at least 90% of assets located in the U.S.?
If not, complete line 10. | — | <u>x</u> |
| 10. | Is line 6 at least 6 times line 1? | <u>x</u> | — |

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

cc: Michigan Dept. of
Natural Resources


W. M. Caldwell
Executive Vice President and
Chief Financial Officer

January 14, 1983

Auditors' Opinion

Financial Responsibility

To the Board of Directors and Stockholders
of Ford Motor Company

We have examined the consolidated balance sheet of Ford Motor Company and Consolidated Subsidiaries as of December 31, 1981 and 1980, and the related consolidated statements of income, stockholders' equity and changes in financial position for each of the three years in the period ended December 31, 1981. Our examinations were made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

In our opinion, the financial statements referred to above present fairly the consolidated financial position of Ford Motor Company and Consolidated Subsidiaries at December 31, 1981 and 1980, and the consolidated results of operations and changes in financial position for each of the three years in the period ended December 31, 1981, in conformity with generally accepted accounting principles applied on a consistent basis.

Coopers & Lybrand

Coopers & Lybrand
400 Renaissance Center
Detroit, Michigan 48243
(313) 446-7100
February 12, 1982

Management is responsible for the preparation of the Company's financial statements and the other financial information in this report. This responsibility includes maintaining the integrity and objectivity of the financial records and the presentation of the Company's financial statements in accordance with generally accepted accounting principles.

The Company maintains a system of internal controls designed to provide reasonable assurance that its records reflect the transactions of its operations in all material respects and to provide protection against significant misuse or loss of Company assets. The internal-control system is supported by a staff of internal auditors who employ thorough auditing programs, by careful selection and training of financial-management personnel, and by written procedures that communicate the details of the control system to the Company's worldwide activities.

The Company's financial statements have been examined by Coopers & Lybrand, independent certified public accountants. Their examination was made in accordance with generally accepted auditing standards which included a review of the internal-control system. The Auditors' Opinion appears on this page.

The Board of Directors, acting through its Audit Committee composed solely of directors who are not employees of the Company, is responsible for determining that management fulfills its responsibilities in the preparation of financial statements and the financial control of operations. The Audit Committee appoints the independent public accountants subject to ratification by the stockholders. It meets regularly with management, internal auditors and independent accountants. The independent accountants have full and free access to the Audit Committee and meet with it to discuss their audit work, the Company's internal controls and financial-reporting matters.

Supplementary Disclosures

Worldwide Sales and Operating Income by Line of Business

(dollar amounts in millions)

	1981		1980		1979	
	Amount	Percent	Amount	Percent	Amount	Percent
Sales						
Automotive.....	\$34,673	91%	\$33,303	90%	\$39,899	92%
All Other*.....	3,574	9	3,783	10	3,615	8
Total.....	<u>\$38,247</u>	<u>100%</u>	<u>\$37,086</u>	<u>100%</u>	<u>\$43,514</u>	<u>100%</u>
Operating Income						
Automotive.....	\$ (1,246)	(99)%	\$ (2,179)	(96)%	\$ 736	80%
All Other*.....	(10)	(1)	(99)	(4)	181	20
Total.....	<u>\$ (1,256)</u>	<u>(100)%</u>	<u>\$ (2,278)</u>	<u>(100)%</u>	<u>\$ 917</u>	<u>100%</u>

*All Other category includes Tractor Operations and the nonautomotive products of Steel Division, Glass Division and Ford Aerospace & Communications Corporation.

Ford Motor Company
Dearborn, Michigan

We have examined the consolidated financial statements of Ford Motor Company and Consolidated Subsidiaries for the year ended December 31, 1981, and have issued our report thereon dated February 12, 1982. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

Mr. W. M. Caldwell, Ford Motor Company Executive Vice President and Chief Financial Officer, stated in a letter dated January 14, 1983, to the United States Environmental Protection Agency Regional Administrators that the data in paragraph 4, items 5, 6 and 9, of that letter had been derived from the financial statements referred to above. We have compared that data with corresponding data which we have derived from such financial statements.

In connection with the aforementioned procedure, no matters came to our attention which caused us to believe that the specified data should be adjusted.

Coopers & Lybrand

Coopers & Lybrand
400 Renaissance Center
Detroit, Michigan 48243
January 14, 1983




Ford Motor Company
Environmental and Safety
Engineering Staff

One Parklane Boulevard
Dearborn, Michigan 48126

July 6, 1982

Regional Administrator
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Regional Administrator 
U.S. EPA, Region V
230 South Dearborn Street
Chicago, Illinois 60604

Regional Administrator
U.S. EPA, Region VII
1775 Baltimore Street
Kansas City, Missouri 64108

Regional Administrator
U.S. EPA, Region IX
215 Fremont Street
San Francisco, California 94105

Subject: RCRA Financial Assurance Requirements

Reference: 47 Fed. Reg. 15032 of April 7, 1982

Dear Administrator:

As required by regulations promulgated in the Federal Register referenced above, we enclose herewith the following documents:

- 1) A letter to you signed by the Chief Financial Officer of Ford Motor Company and dated July 2, 1982. It demonstrates Ford Motor Company's financial test specified in Subpart H of 40 CFR Parts 264 and 265.
- 2) A copy of the independent certified public accountant's report on examination of the owner's operator's financial statements for the latest completed fiscal year. This is shown on page 34 of the Company's 1981 Annual Report.
- 3) A special report from the independent certified public accountant as specified in section 265.143(e)(3)(iii).

A copy of the attached documents is being sent to each state agency in which the listed facilities are located.

Yours very truly,



A.B.M. Houston, Manager
Compliance and Liaison Department
Stationary Source
Environmental Control Office
(313) 594-0324

cc: California Dept. of Health Services
Indiana Environmental Management Board
Kentucky Dept. for Natural Resources and Environmental Protection
Michigan Dept. of Natural Resources
Missouri Dept. of Natural Resources
Ohio Environmental Protection Agency

Enclosure
gk




Ford Motor Company

The American Road
Dearborn, Michigan 48121

July 2, 1982

Regional Administrator
U.S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Regional Administrator 
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Regional Administrator
U.S. Environmental Protection Agency
Region VII
1775 Baltimore Street
Kansas City, Missouri 64108

Regional Administrator
U.S. Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco, California 94105

I am the chief financial officer of Ford Motor Company, The American Road, Dearborn, Michigan 48121. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

<u>Facility & Address</u>	<u>Region</u>	<u>EPA I.D. Number</u>	<u>RCRA Closure Costs</u>	<u>RCRA Post Closure Costs</u>	<u>Totals</u>
Allen Park Clay Mine Oakwood Blvd. & Southfield Allen Park, MI 48101	V	MIT270010093	\$ 120,000	\$ 155,000	\$ 275,000
Indianapolis Trans. & Chassis Plant 6900 English Avenue Indianapolis, IN 46206	V	IND001926013	25,000	-	25,000
Kansas City Assembly Plant U.S. Highway 69 Claycomo, MO 64119	VII	MOD007118078	114,000	-	114,000
Lima Engine Plant 1155 Bible Rd. Lima, OH 45802	V	OHD005051289	20,000	-	20,000

July 2, 1982

<u>Facility & Address</u>	<u>Region</u>	<u>EPA I.D. Number</u>	<u>RCRA Closure Costs</u>	<u>RCRA Post Closure Costs</u>	<u>Totals</u>
Michigan Casting Center 22000 Gibraltar Rd. Flat Rock, MI 48134	V	MID058819822	\$ 25,000	\$ -	\$ 25,000
Milan Plastics Plant 800 County St. Milan, MI 48160	V	MID091955476	133,000	-	133,000
Monroe Stamping Plant 3200 E. Elm Ave. Monroe, MI 48161	V	MID005057005	6,020,000	450,000	6,470,000
Mt. Clemens Paint Plant 400 Groesbeck Hwy. Mt. Clemens, MI 48043	V	MID005358825	146,000	-	146,000
Mt. Clemens Vinyl Plant 151 Lafayette Mt. Clemens, MI 48043	V	MID076342708	227,000	-	227,000
Romeo Tractor & Equipment Plant 701 E. 32 Mile Rd. Romeo, MI 48065	V	MID078400165	15,000	-	15,000
Saline Plastics Plant 7700 Michigan Ave. Saline, MI 48176	V	MID009305665	1,160,000	-	1,160,000
Utica Trim Plant 50500 Mound Rd. Utica, MI 48087	V	MID005379854	10,000	-	10,000
Total			\$8,015,000	\$605,000	\$8,620,000

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None
3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

July 2, 1982

<u>Facility & Address</u>	<u>Region</u>	<u>EPA I.D. Number</u>	<u>RCRA Closure Costs</u>	<u>RCRA Post Closure Costs</u>	<u>Totals</u>
Louisville Assembly Plant Fern Valley Rd. Louisville, KY 40201	IV	KYD071315899	\$250,000	\$ -	\$250,000
Aeronutronic Division (Ford Aerospace) Ford Rd. Newport Beach, CA 92663	IX	CAD041330077	20,000	-	20,000
Western Development Labs (Ford Aerospace) 3939 Fabian Way Palo Alto, CA 94303	IX	CAD000030528	33,000	-	33,000
Total			\$303,000	\$ -	\$303,000

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None

This firm is required to file a Form 10K with the Securities and Exchange Commission for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1981.

(Alternative II)

1. Sum of current closure and post-closure cost estimates (total of ALL cost estimates shown in the four paragraphs above) \$8,923,000
2. Current bond rating of most recent issuance of this firm and name of rating service BBB+ (Standard & Poor's Corp.)
Baa-2 (Moody's Investors Svc.)
3. Date of issuance of bond June 30, 1982
4. Date of maturity of bond June 15, 1985
- *5. Tangible net worth (if any portion of the closure and post-closure cost estimates is included in "total liabilities" on your firm's financial statements, you may add the amount of that portion to this line) \$ 7,083 Million
- *6. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.) \$11,533 Million

July 2, 1982

	<u>Yes</u>	<u>No</u>
7. Is line 5 at least \$10 million?	X	
8. Is line 5 at least 6 times line 1?	X	
*9. Are at least 90% of firm's assets located in the U.S.? If not, complete line 10.		X
10. Is line 6 at least 6 times line 1?	X	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.



W. M. Caldwell
Executive Vice President and
Chief Financial Officer

July 2, 1982

Date

Ford Motor Company
Dearborn, Michigan

We have examined the consolidated financial statements of Ford Motor Company and Consolidated Subsidiaries for the year ended December 31, 1981, and have issued our report thereon dated February 12, 1982. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

Mr. W. M. Caldwell, Ford Motor Company Executive Vice President and Chief Financial Officer, stated in a letter dated July 2, 1982 to the United States Environmental Protection Agency Regional Administrators that the data in paragraph 7, items 5, 6 and 9, of that letter had been derived from the financial statements referred to above. We have compared that data with corresponding data which we have derived from such financial statements.

In connection with the aforementioned procedure, no matters came to our attention which caused us to believe that the specified data should be adjusted.



Coopers & Lybrand
400 Renaissance Center
Detroit, Michigan 48243
July 2, 1982

FORD ALLEN PARK CLAY MINE

MID 980 568 711

A.4.5

I-4 - Closure Cost Estimate 40 CFR 270.14(b)(15)

Closure cost estimate is calculated to cover the cost of closure when the cost would be greatest and the exposed area is at a maximum (10 acres) (40 CFR 264.142(a)). This cost is updated annually using an inflation factor.

(July 10, 1984)

1. Application of bedding layer for PVC cover

10 acres @ 1 ft. of subbase or

16,133 Yd.³ @ \$1.50 yd.³

\$ 24,200

inspection cost

\$ 3,000

2. 10 mil PVC cover material and installation

435,600 ft.² @ \$.15/ft.²

\$ 65,340

inspection cost

\$ 3,000

3. Drainage pipe

materials: 1,800 ft. @ \$.85/ft.

\$ 1,530

labor: 1,800 ft. @ \$1.15/ft.

\$ 2,070

inspection cost:

\$ 500

4. Drainage blanket

10 acres @ 1 ft. or

16,133 yd.³ @ \$1.50 yd.³

\$ 24,200

inspection cost

\$ 3,000

5. Compacted Clay

10 acres @ 3 ft.

48,390 yd.³ @ \$1.50 yd.³

\$ 72,600

inspection cost

\$ 9,000

I-4

Closure Cost Estimate 40 CFR 270.14(b)(15) (Cont'd)

6. Topsoil

10 acres @ 4 inches or

5,378 yd.³ @ \$1.50 yd.³

\$ 8,067

inspection cost

\$ 1,000

7. Fertilize, seed, mulch

10 acres @ \$1,000 acre

\$ 10,000

Total

\$227,507

Costs provide for 16.5 acres of landfill.

(July 10, 1984)

1. Fertilization

Application of 800#/ac. of 12-12-12

over 16.5 acres @ 2 events

\$109/acre

\$ 3,597

2. Reseeding and Mulching

Assuming 10% replacement

over 16.5 acres

for first 3 years

\$1,000/ac. @ 4.95 acres

\$ 4,950

3. Erosion damage

Acreage involved: 16.5 acres

annual soil loss 1 yd³/ac.

transport soil, compact, seed @ \$45/yd.³

total cost: 30 years @ 16.5 ac. x \$45

\$ 22,275

4. Cover settlement

Repair settlements to design

specifications (estimated contingency)

\$ 20,000

5. Fencing

Replace 3,500 feet of chain link fence

@ \$6.30/ft.

\$ 22,050

6. Groundwater monitoring

Annual static water elevations

on artesian aquifer

8 hours @ \$30/hour x 30 years

\$ 7,200

7. Leachate collection system maintenance

Pump replacements (2)	\$ 5,000	
Power supply repairs	\$ 5,000	
Collection pipe clean outs	\$ 5,000	
Contingencies	\$10,000	\$ 25,000

8. Facility inspections

(2 hours/week) (52 weeks/yr.) (30 years)

= 3,120 hours @ \$20 hour \$ 62,400

9. Administrative services

Annual cost -

Senior Engineer 8 hours @ \$50 hour \$ 400

Technical Services 20 hours @ \$20 hour \$ 400

Clerical Services 16 hours @ \$20 hour \$ 320

Annual Total Expense \$ 1,120

30 years @ \$1,120/year \$ 33,600

Total \$201,072

Annual Cost \$6,702

